

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
)	
NEW ENGLAND GAS COMPANY;)	
SOUTHERN UNION COMPANY)	
Defendant and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.)	
Third-Party Defendants.)	

JOINT MOTION TO AMEND PRETRIAL ORDER

Pursuant to Fed.R.Civ.P. 26 and LR Cv 26, Third Party Plaintiff Southern Union Company/ New England Gas Company (collectively, "Southern Union") and Third-Party Defendants Bridgestone Americas Tire Operations, LLC ("Bridgestone") and Honeywell International Inc. ("Honeywell") jointly request that the Court amend its Pretrial Order entered on August 14, 2012,¹ by amending the dates contained therein by approximately six to eight weeks as follows:

1. All factual discovery closed by: November 30, 2012
2. All expert discovery closed by: May 13, 2013
3. Dispositive motions filed by: June 10, 2013
4. Third-Party Plaintiff expert witness disclosures: January 28, 2013
5. Third-Party Defendants' expert witness disclosures: March 11, 2013

¹ Specifically, the Court entered a text order on August 14, 2012, granting the parties' Joint Motion to Amend Pretrial Order (Doc. 877).

6. Pretrial Memoranda, if no dispositive motions: June 10, 2013
(or 30 days after decision on dispositive motions)

In support of this joint motion, the parties state that Southern Union has now engaged in mediation with both Bridgestone and Honeywell, and has reached settlements in principle with both. The parties are now working on and have made significant progress toward finalizing the language of their respective settlement documents. As such, the parties request this extension of pre-trial deadlines to allow sufficient time to complete their respective settlement documentation. The parties therefore respectfully request that the Court amend the Pretrial Order by extending the dates for the additional weeks as set forth above.

SOUTHERN UNION COMPANY AND
NEW ENGLAND GAS COMPANY

HONEYWELL INTERNATIONAL INC.

By its Attorneys,

By its Attorneys,

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Dated: October 11, 2012

CERTIFICATE OF SERVICE

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I hereby certify that on the 11th day of October, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

#50951283 (14015/126110)